

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x Chapter 11
In re: Case No. 18-23538 (RDD)
SEARS HOLDINGS CORPORATION, et al. (Jointly Administered)
Debtors

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**JOINDER BY K-BAY PLAZA, LLC IN OBJECTION OF VARIOUS LANDLORDS
TO NOTICES OF FILING OF REVISED PROPOSED ORDER (I) APPROVING THE
ASSET PURCHASE AGREEMENT AMONG SELLERS AND BUYER, (II)
AUTHORIZING THE SALE OF CERTAIN OF THE DEBTORS' ASSETS FREE AND
CLEAR OF LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES, (III)
AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS, AND LEASES IN CONNECTION THEREWITH AND
(IV) GRANTING RELATED RELIEF**

K-Bay Plaza, LLC ("K-Bay"), by its undersigned counsel, hereby Joins in Objection of Various Landlords as stated in Docket Numbers 2380 and 2380-1 to the *Notice of Filing Revised Proposed Order (I) Approving the Asset Purchase Agreement Among Sellers and Buyer (II) Authorizing the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and (IV) Granting Related Relief* [Docket No. 2332] (the "First Revised Proposed Sale Order") and the *Notice of Filing Second Revised Proposed Order (I) Approving the Asset Purchase Agreement Among Sellers and Buyer (II) Authorizing the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (III) Authorizing the Assumption and Assignment of*

Certain Executory Contracts and Unexpired Leases in Connection Therewith and (IV) Granting Related Relief [Docket No. 2378] (the “Second Revised Proposed Sale Order”) cure amount (the “Cure Objection”).

CONCLUSION

WHEREFORE, K-Bay respectfully requests that the Court (i) if the Court approves the proposed sale of substantially all of the Debtors’ business assets to the Buyer, any order approving the sale incorporate the changes outlined in the Landlords’ Proposed Sale Order and (ii) grant to the Landlords such other and further relief as is just and appropriate.

Dated: February 5, 2019
New York, NY

Eiseman Levine Lehrhaupt & Kakoyiannis, P.C.

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